## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA \* CRIMINAL NO. 09-328

v. \* SECTION: "N"

ROLANDO CASTELAN

FACTUAL BASIS

If this case were to proceed to trial, the United States would prove the following facts beyond a reasonable doubt:

On September 1, 2009, the defendant, Rolando CASTELAN attempted to gain access to C-Port One, a critical infrastructure, using a counterfeit document. A security guard working the gate noticed that the Form I-551 Legal Permanent Resident Card presented by CASTELAN appeared to be fake. John W. Haag, a Customs and Border Protection Enforcement Officer was contacted by Port of Morgan City Director to inform him of the situation.

Officer Haag responded to the Harbor Police Office. CASTELAN was given both a written and verbal Miranda Warning in Spanish. He confirmed that he was from Mexico but chose to invoke his right to remain silent.

The I-551 possessed by CASTELAN contained A file # A-091-590-441. A Central Index System check showed that the I-551 belongs to a resident alien named Roberto Giron-Ayala from Mexico. A review of the I-551 by a U.S. Department of Homeland Security forensic document examiner revealed that the document was counterfeit. It did not contain genuine security features and was produced using incorrect printing methods.

Read and Approved:		
ROLANDO CASTELAN Defendant	Date	
MARIA CALVO Defense Counsel	Date	
TRACEY N. KNIGHT Assistant United States Attorney	Date	